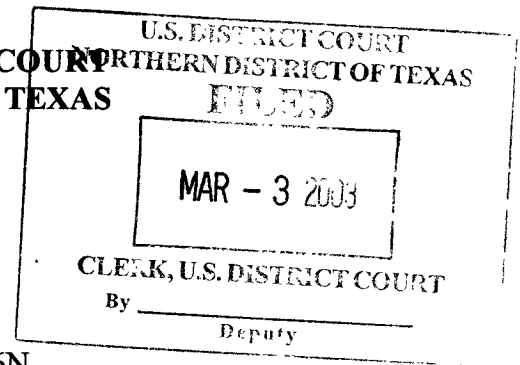


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



Robert N. Goldstein,
Goldstein/Habeeb
Entertainment, Inc., and
Cheaters, Ltd.,
Plaintiffs

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3 03 CV 0266N

vs.

Tommy Habeeb
Defendant

ORIGINAL ANSWER OF
DEFENDANT
TOMMY HABEEB

TO THE HONORABLE JUDGE OF SAID COURT:

1. 12(b)6 Motion: Defendant Habeeb moves the Court as follows: To dismiss the action because the complaint fails to state a claim against Defendant upon which relief can be granted in that the Complaint alleges and admits judicially that the proprietary rights made the basis of these claims were exclusively licensed to the corporate Plaintiff of which Defendant is a one-half owner, not a minority shareholder; **and** the license was never properly revoked or otherwise terminated. Therefore, Plaintiffs' action for injunctive relief and damages fail to lie as averred.

2. Habeeb admits Paragraph I, subparagraph 1.01 and 1.02, but denies Paragraph II, subparagraph 2.01 regarding pendent jurisdiction. He admits Paragraph II, subparagraph 2.02 but denies Paragraph 2.03. Habeeb is without sufficient information to admit or deny Paragraph III,

subparagraph 3.01 to 3.07 since individual Plaintiff maintained the business records and corporate books and records. However, Habeeb denies Paragraph III subparagraph 3.07 through 3.11 of the Complaint.

3. Habeeb denies all averments and allegations in Paragraph IV, specifically subparagraph 4.01 through subparagraph 4.02 of the Complaint.

4. Habeeb admits that both Plaintiff Goldstein and he owed fiduciary duties to the company and one to another, but denies Defendant has breached such duty; and he denies all averments and allegations in Paragraph V specifically subparagraph 5.03 and subparagraph 5.04 of the Complaint.

5. Habeeb denies all averments and allegations in Paragraphs VI, specifically subparagraph 6.01 and 6.02 of the complaint; and he denies all averments and allegations in Paragraph VII, specifically subparagraph 7.01 through subparagraph 7.05 of the Complaint.

6. Habeeb denies all averments and allegations in Paragraph VIII, specifically subparagraph 8.01 through subparagraph 8.02 of the Complaint.

7. Habeeb denies all averments and allegations in Paragraph IX, specifically subparagraph 9.01 through subparagraph 9.04 of the Complaint.

8. As to each averment not specifically admitted, denied or responded to in terms of being without sufficient information to admit or deny such averment, Habeeb denies such.

Respectfully submitted,



Cecil W. Casterline
5310 Harvest Hill, Ste. 296W, LB 122

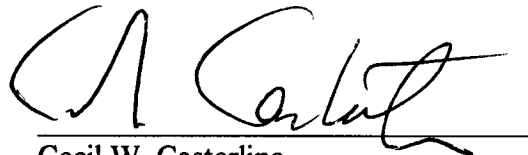
Dallas, Texas 75230
(972) 991-5900-telephone
(972) 991-5901-facsimile
State Bar No. 03983000

ATTORNEY FOR DEFENDANT TOMMY
HABEEB

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was forwarded via C.M.R.R.R., and in accordance with the Federal Rules to all parties, by and through their attorney of record on this the 3 day of March, 2003.

Tommy Sorenson
1717 Main St., Ste. 4050
Dallas, Texas 75201-4639


Cecil W. Casterline